

**PACIFIC DELAWARE INC.
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WILMINGTON DE19899**

September 23, 2005

Docket Clerk
Marketing Order Administration Branch
Fruit and Vegetable Programs
AMS, USDA
1400 Independence Avenue, SW
STOP 0237
Washington, DC 20250-0237

RE: Docket No. FV03-925-1PR
Federal Register Vol.70, No. 100, Page 30001
Grapes Grown in a Designated Area of Southeastern California and Imported Table
Grapes; Proposed Change in Regulatory Period

**COMMENTS IN OPPOSITION TO PROPOSED CHANGE IN THE BEGINNING
EFFECTIVE DATE OF MARKETING ORDER 925 AND IMPORT REGULATION 4**

Dear Docket Clerk:

Pacific Delaware, Inc. opposes the above referenced change in dates that address Table Grape Marketing Order 925 restrictions being placed on table grapes supplied from Chile.

Pacific Delaware, Inc. contracts with the Port of Wilmington Delaware to warehouse Chilean fresh fruit. Pacific Delaware receives an average of over 12 million cases of Chilean fresh fruit during the months of December through July. The fresh fruit received from Chile at The Port of Wilmington Delaware generates thousands of man hours for union and nonunion employees. The economic impact generated by Chilean fruit results in millions of payroll dollars and Federal and State taxes.

In addition, other port businesses and service providers such as, stevedore companies, terminal operating companies, pilots, tug boat companies, line runners, refrigerated warehouse operators, fumigation companies, cargo inspectors, and trucking companies are directly involved with this trade, generating millions of dollars in related economic activity over Pennsylvania, New Jersey and Delaware.

We have reviewed and agree with the detailed comments and supporting data submitted by the Association de Exportadores de Chile (ASOEX), the Chilean Exporters Association.

To change the beginning effective date of the marketing order from April 20 to April 1 will have a direct negative effect on our business due to the loss of thousand of cases of fresh fruit that traditionally arrive during this time.

September 26, 2005

This proposed change will also have a negative economic impact on Delaware, Pennsylvania and New Jersey as well. Chilean fresh fruit is a major commodity handled at these port facilities in the tri-state area, generating millions of dollars in related economic activity.

In closing, Pacific Delaware, Inc. respectfully requests that this proposed rule change be denied by the USDA.

Respectfully submitted,

John S. Chagin
President
Pacific Delaware, Inc.